

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-39 through 49]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 17, 2011

Respectfully submitted,

N20111G39

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-39 The Postal Service has established various criteria for those facilities that are being considered for discontinuance or consolidation.

[a] Does the listing of facilities being considered represent 100-percent of those facilities that meet the criteria?

[b] If not, please advise the approximate number of facilities that are not on the list even though they meet the criteria for inclusion.

[c] If not, please provide the reasons why these facilities were not included on the list.

DBP/USPS-40 [a] Approximately what percentage of the facilities that are being considered for discontinuance or consolidation utilize a POS terminal?

[b] Please provide a breakdown of the other types of accounting terminals that are in use at the facilities on the list.

DBP/USPS-41 Please refer to the response to Interrogatory PR/USPS-T1-13 subparts [a] through [e].

[a] Please confirm, or explain if you are unable to confirm, that the response in each of these five subparts of “None.” indicates that there are no facilities on the list for consideration for discontinuance or consolidation that are co-located with the type of unit/facility specified.

[b] Please provide a similar response for an HCR delivery unit.

[c] If your response to subpart [b] is also “None.”, please confirm, or explain if you are unable to confirm, that all of the facilities on the list have only post office box delivery at their facility.

DBP/USPS-42 Please refer to your response to Interrogatory DBP/USPS-28. Since the hypothetical presented would be possible to utilize and would eliminate the inconvenience of the affected customers of a discontinuance or consolidation to have to go through the process of address change notification, please provide the conditions under which this concept would or would not be utilized.

DBP/USPS-43 Please refer to your response to Interrogatory DBP/USPS-29 subpart [c] as it applies to Approved Shippers.

[a] Please provide a listing of the types of mail that may be accepted by an Approved Shipper.

[b] Please provide a listing of the types of mail that may not be accepted by an Approved Shipper.

[c] Do all Approved Shippers sell postage?

[d] If not, approximately what percentage do?

[e] Please advise the denominations and format of the postage that is sold.

[f] Do all Approved Shippers sell packaging?

[g] If not, approximately what percentage do?

DBP/USPS-44 Please refer to your response to Interrogatory DBP/USPS-29 subpart [c] as it applies to Consignment operations.

[a] Please confirm, or explain if you are unable to confirm, that Consignment Operators do not accept mail nor provide any other postal service except the selling of postage stamps.

[b] Please advise the denominations and format of the postage that is sold.

DBP/USPS-45 Please refer to your response to Interrogatory DBP/USPS-30.

Please explain why the revenue figure that was utilized in determining whether a specific facility is to be studied for discontinuance of consolidation is limited to revenue that requires interaction with or activity by retail window personnel who perform work associated with the mail or service in question.

DBP/USPS-46 Please refer to your response to Interrogatory DBP/USPS-32.

[a] Please provide copies of any guidelines, either in the Domestic Mail Manual or at the Headquarters level, regarding whether or not retail window service should be provided on Saturdays.

[b] Please confirm, or explain if you are unable to confirm, that if a facility that is discontinued or consolidated has Saturday retail window service and the Alternate Access Site being considered does not have Saturday service, the discontinuance will have an even greater effect on the customers of the discontinued facility.

DBP/USPS-47 Please refer to your response to Interrogatory DBP/USPS-20.

[a] Will any special consideration be given to the collection times since the collection box is located in front of a postal facility?

[b] If not, why not?

DBP/USPS-48 Please refer to your response to Interrogatory DBP/USPS-26. For a Village Post Office, does the Postal Service pay the contractor or receive payment from the contractor?

DBP/USPS-49 Please refer to your response to Interrogatory DBP/USPS-27. Which of the columns in the chart provided in response to Interrogatory DBP/USPS-6 apply to the services provided by a Village Post Office? If necessary, please provide a separate chart showing the available services at a Village Post Office compared to an independent post office and classified station/branch. Furthermore, provide complete information when the full service of a given category is not provided such as the acceptance of Priority Mail Flat-Rate containers only or the sale of full “units” of Forever Stamps only.